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5 Attorneys for Defendant
6 DELVIN WARD

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,)
12 Plaintiff,) Case No.: 2:08-cr-00283-RCJ (PAL)
13 v.)
14 DELVIN WARD,)
15 Defendant.)

**STIPULATION TO CONTINUE DUE DATE FOR DEFENDANT TO FILE MOTION
OR STIPULATION FOR REDUCTION OF SENTENCE**
(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
Esq., United States Attorney, and Assistant United States Attorney Elizabeth Olson White, Esq.
and Richard J. Pocker, Esq., counsel for Defendant DELVIN WARD, that Defendant WARD
shall have to and including June 26, 2015 in which to file any motion or stipulation for
reduction of sentence pursuant to U.S. Sentencing Guidelines Amendment 782, as
contemplated by the Court's Order of February 11, 2015.

26 IT IS FURTHER STIPULATED AND AGREED that the United States Attorney shall
27 serve any response to any motion for reduction of sentence pursuant to U.S. Sentencing
28 Guidelines Amendment 782 by July 25, 2015.

1 This Stipulation is entered into for the following reasons:

2 1. On February 11, 2015, the undersigned counsel for Defendant WARD was
3 appointed by the Court to assist Mr. WARD in seeking a reduction of his sentence, if such
4 reduction was warranted, pursuant to U.S. Sentencing Guidelines Amendment 782. The
5 Court's Order of February 11, 2015 provided that any motion for reduction of sentence or
6 stipulation for reduction of sentence reached between the Defendant and the United States
7 Attorney be filed no later than 120 days from the date of that Order. The motion or stipulation
8 is presently due by June 11, 2015.

9 2. The parties have been involved in discussions and correspondence regarding the
10 preparation of a stipulation for submission to the Court in lieu of a motion for reduction of
11 sentence. Defendant WARD was previously incarcerated in the Florence, Colorado
12 correctional facility, and has recently been travelling pursuant to a transfer to another
13 correctional facility, at which he has not yet arrived. Consequently, counsel for Defendant
14 WARD has not had the opportunity to have discussions or correspondence with him regarding
15 the final aspects of the stipulation. Allowing an additional fifteen (15) days in which to file
16 either a motion or stipulation in accordance with the Court's February 11, 2015 directive
17 should assure that Defendant WARD reaches his new site of incarceration, from which
18 communication with him can more effectively be accomplished.

19 3. The additional time requested herein is not sought for purposes of delay, but
20 merely to insure that Defendant WARD and his counsel have adequate opportunity to discuss
21 or communicate regarding the proposed stipulation regarding his request for sentence
22 reduction. The requested extension moves each of the affected deadlines by just fifteen (15)
23 days.

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1 4. This is the first request to continue the date affected by the requested extensions.
2 DATED this 20th day of May, 2015.

3 BOIES, SCHILLER & FLEXNER

DANIEL G. BOGDEN,
United States of America

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5 By: s/ Richard J. Pocker
6 RICHARD J. POCKER, ESQ.
7 Counsel for Delvin Ward

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10 By: s/ Elizabeth O. White
11 ELIZABETH OLSON WHITE, ESQ.
12 Assistant United States Attorney,
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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

ORDER

Based on the pending Stipulation of counsel, and good cause appearing,

IT IS THEREFORE ORDERED that Defendant DELVIN WARD shall have to and including June 26, 2015 in which to file his motion or stipulation for reduction of sentence pursuant to U.S. Sentencing Guidelines Amendment 782, and that the United States' response to any such motion shall be filed by July 25, 2015.

Dated this 20th day of May, 2015.


R. Jones
UNITED STATES DISTRICT JUDGE